

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Naji Chammout

CHAPTER 13

CASE NO. 19-55006-MAR

JUDGE MARK A RANDON

Debtor

/

TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee objects to debtor's failure to disclose income from operation of businesses in Part 1 of the Means Test Form 122C-1 as it could affect the applicable commitment period and plan length pursuant to 11 U.S.C. § 1325(b)(4). Trustee requests amendment of same and documentation of the income disclosed during the 6-month lookback period.
2. Trustee questions debtor's valuation of his interest in Westborn Studios Inc. on Schedule B and requests all purchase documents, including purchase money loans, security interest, bill of sale, lease, franchise or royalty agreement with Paint With a Twist and any other documentation upon which debtor relies, as it may affect the best interest of creditors pursuant to 11 U.S.C. § 1325(a)(4).
3. Where it appears that debtor's interpreter income is overstated, but his income from Westborn Studios is understated, Trustee requests verification of debtor's income from all sources, including business and personal bank statements and Profit and Loss statements for November 2019 through confirmation of debtor's Plan.

Trustee requires the verification to be received by the Trustee immediately.

4. Trustee requests debtor to provide copies of his personal and business 2019 tax returns with all W-2s/1099s issued and received, when filed.
5. Trustee requests that any Order Confirming Plan include a provision that debtor will provide personal and business tax returns and verification of income yearly in compliance with 11 U.S.C. § 521(f).

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

Dated: January 06, 2020

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARGARET CONTI SCHMIDT

Krispen S. Carroll (P49817)

Margaret Conti Schmidt (P42945)

719 Griswold Street, Ste 1100

Detroit, MI 48226

(313) 962-5035

notice@det13ksc.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Naji Chammout

CHAPTER 13

CASE NO. 19-55006-MAR

JUDGE MARK A RANDON

Debtor _____ /

CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

FAIRMAX LAW
1 PARKLANE BLVD
SUITE 729 E
DEARBORN, MI 48126

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

Naji Chammout
2051 North York Street
Dearborn, MI 48128

January 06, 2020

/s/ Barb Ecclestone

BARB ECCLESTONE

For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street, Ste 1100
Detroit, MI 48226
(313) 962-5035
notice@det13ksc.com